

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

OCCIDENTAL CHEMICAL CORPORATION,) Hon. Madeline Cox Arleo
) Hon. Magistrate Leda D. Wettre
)
) Civil Action No. 2:18-CV-11273
Plaintiff,) (MCA-LDW)
)
v.) NOTICE OF MOTION FOR A
) STAY OF PROCEEDINGS AND
) FOR LEAVE TO FILE SAME
)
21ST CENTURY FOX AMERICA, INC., <i>et al.</i> ,)
)
)
Defendants and Third Party Plaintiffs,)
)
v.) Return Date: February 7, 2022
) Oral Argument Requested
)
PASSAIC VALLEY SEWERAGE COMMISSIONERS, <i>et al.</i> ,)
)
)
<u>Third-Party Defendants.</u>)

PLEASE TAKE NOTICE that on February 7, 2022 Defendants in the Small Parties Group, the Gordon Rees Group, and the CSG Group, along with all Third-Party Defendants (individually and collectively, “Moving Parties”)¹ will move before the Honorable Madeline Cox Arleo for (a) an Order granting leave to file a motion for an order approving a stay of the above-captioned proceedings and (b) an Order approving a stay of the above-captioned proceedings.

In support of this motion, the Moving Parties rely on the attached briefs.

A proposed form of Order is submitted for the Court’s consideration.

¹ Defendant SPG members Nokia of America Corporation, Pharmacia LLC, and Public Service Electric and Gas Company have no objection to the relief sought in the Motion for a Stay of Proceedings and accompanying proposed form of Order filed this date, but do not join the brief.

Dated: January 14, 2022

Respectfully submitted,

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CERTIFICATE OF SERVICE

I, Jeffrey D. Talbert, hereby certify that on January 14, 2022, I caused a copy of the foregoing to be served via electronic filing on all counsel of record.

Dated: January 14, 2022

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